

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

NICOLE DINITTO, JACQUELINE
BONOMO, and GABRIELLE WAISBLATT,

Plaintiffs,

v.

DEAN NOLE, JASON NOLE and
CAFÉ CaNOLE, INC.,

Defendants.

STIPULATION

No. 6:22-cv-347 (GTS/TWD)

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the parties herein as follows:

1. Plaintiffs hereby withdraw, with prejudice, all claims against Defendants brought under the Trafficking Victim's Protection Act, 18 U.S. Code § 1591, as well as claims under the Gender Motivated Violence Protection Act, N.Y. ADC. LAW § 8-903;
2. Defendants will not assert any arguments or defenses that they are not subject to jurisdiction under Title VII, and hereby voluntarily subject themselves to the subject matter and personal jurisdiction of this federal court. This Stipulation does not prohibit Defendants was asserting non-jurisdictional arguments or defenses; and
3. Defendant will not move to dismiss Plaintiffs' First Amended Complaint and will file an Answer to Plaintiffs' First Amended Complaint within thirty (30) days.

DATED: November 28, 2022

DEREK SMITH LAW GROUP, PLLC

/s Danilo Bandovic

By: _____
Danilo Bandovic, Esq.

Attorneys for Plaintiffs
Derek Smith Law Group, PLLC
One Penn Plaza Suite 4905
New York, New York 10119
(212) 587-0760
danilo@dereksmithlaw.com

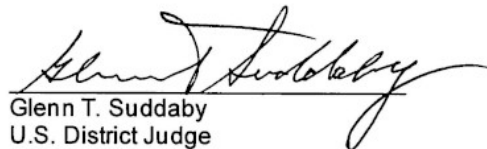
BARCLAY DAMON LLP

/s Michael J. Sciotti

By: _____
Michael J. Sciotti, Esq.

Attorneys for Defendants
Barclay Damon LLP
125 East Jefferson Street
Syracuse, New York 13202
(315) 425-2774
msciotti@barclaydamon.com

SO ORDERED


Glenn T. Suddaby
U.S. District Judge